



Barksdale Perez, E. Leon Carter, Joshua J. Bennett and Michael C. Pomeroy of the firm Carter Arnett Bennett & Perez PLLC (collectively, “***Carter Arnett***”) [Dkt. 12].

4. On August 8, 2024, the Court granted Defendants’ Motion to Extend, which extends Defendants’ deadline to answer or otherwise to the Original Complaint through September 12, 2024 [Dkt. 13].

5. Defendants request that Carter Arnett be permitted to withdraw and that Justin D. Hanna of Bryan Cave Leighton Paisner LLP (“***Bryan Cave***”) be substituted as local counsel. Mr. Hanna’s contact information is as follows:

Justin D. Hanna  
BRYAN CAVE LEIGHTON PAISNER, LLP  
2200 Ross Ave., Suite 4200W  
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6. Defendants further request that Tyler L. Farmer be substituted as lead counsel of record, and Ariel A. Martinez and Chelsey L. Mam, as additional counsel of record, pending the Court’s granting their respective Applications for Admission *Pro Hac Vice*, which are filed concurrent with this Motion. Mr. Farmer, Ms. Martinez, and Ms. Mam’s contact information is as follows:

Tyler L. Farmer  
Ariel A. Martinez  
Chelsey L. Mam  
BRYAN CAVE LEIGHTON PAISNER, LLP  
999 3<sup>rd</sup> Ave., Suite 4400  
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7. As grounds for this Motion, Defendants state that they desire Bryan Cave to represent them in this litigation based on the firm's substantial intellectual property and complex commercial litigation experience and approve of this withdrawal and substitution of counsel. Defendants have conferred with Plaintiffs' counsel and understand that this motion is unopposed.

8. Defendants request the docket information in this matter be revised to reflect the withdrawal of the law firm of Carter Arnett PLLC and the substitution of Bryan Cave. Specifically, Justin D. Hanna and, upon their admission *pro hac vice*, Tyler L. Farmer, Ariel A. Martinez, and Chelsey L. Mam should be substituted on the ECF service list for this matter and should receive all other and further notice of activity in this case in place of Carter Arnett PLLC.

9. Defendants further move that Tyler L. Farmer be designated as Defendants' lead counsel in this matter, upon his admission *pro hac vice*.

10. This Motion is brought in good faith and is not being made for the purpose of delay or any other improper purpose.

WHEREFORE, Defendants request that the Court enter an order (i) allowing Courtney Barksdale Perez, Joshua J. Bennett and Michael C. Pomeroy of Carter

Arnett PLLC to withdraw as counsel of record for Defendants, (ii) substituting Tyler L. Farmer, Ariel A. Martinez, Chelsey L. Mam and Justin D. Hanna of Bryan Cave as counsel for Defendants in this case, and (iii) granting such other and further relief to which it is justly entitled.

Dated: August 16, 2024

Respectfully submitted,

/s/ Courtney Barksdale Perez\*

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/s/ Justin D. Hanna

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Washington Bar No. 39912

Ariel A. Martinez (*Pro Hac Vice pending*)

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Chelsey L. Mam (*Pro Hac Vice pending*)

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(i), the undersigned certifies that the parties have complied with the meet and confer requirements of Local Rule CV-7(h) and that the foregoing motion and relief sought therein is unopposed.

By: /s/ Justin D. Hanna  
Justin D. Hanna

**CERTIFICATE OF WORD COUNT**

Pursuant to Section II.A. of the Court's Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, the undersigned hereby certifies that, per the word-processor register, the foregoing Motion contains 558 words, excluding the case caption, signature block, and certificates.

By: /s/ Justin D. Hanna  
Justin D. Hanna

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through CM/ECF on August 16, 2024.

By: /s/ Justin D. Hanna  
Justin D. Hanna